

THE CIRCUIT COURT OF MARYLAND FOR PRINCE GEORGE'S COUNTY

PAMELA ANN CLARK
2209 Glenallan Avenue
Silver Spring, MD 20906

and

KATHLEEN OWENS
2209 Glenallan Avenue
Silver Spring, MD 20906

Plaintiffs

vs.

Civil No.: CAL13-27255

CHARLIE BELVIN
243 Unexpected Road
Newfield, NJ 08344

and

SANTELLI TRUCKING, INC.
1404-A East Oak Road
Vineland, NJ 08360

SERVE: Eizen Fineburg & McCarthy, P.C.
89 N. Haddon Avenue, Suite B
Haddonfield, NJ 08033

Defendants

COMPLAINT

COME NOW the Plaintiffs, Pamela Ann Clark and Kathleen Owens, by and through their attorney, Marvin Liss, and sue the Defendants, Charlie Belvin and Santelli Trucking, Inc., and for causes of action state:

COUNT I
(NEGLIGENCE)

1. That on or about September 28, 2010 at approximately 10:35 p.m., the Plaintiff, Pamela Ann Clark, while exercising due care for her own safety, was operating a motor vehicle along I-95 at or near the exit with 198 in Laurel, Maryland.

2. That on or about September 28, 2010 at approximately 10:35 p.m., the Plaintiff, Kathleen Owens, while exercising due care for her own safety, was a passenger in the motor vehicle being operated by the Plaintiff, Pamela Ann Clark, which was travelling along I-95 at or near the exit with 198 in Laurel, Maryland.

3. That at the same time and place aforementioned, the Defendant, Charlie Belvin, was operating a motor vehicle along I-95 at or near the exit with 198 in Laurel, Maryland.

4. That at the same time and place aforementioned, it became the duty of said Defendant to operate his vehicle in a safe and prudent manner, to maintain a constant vigilance for all other vehicles around him and ahead of him, and to observe all the traffic laws, rules and regulations of the State of Maryland.

5. That notwithstanding the aforementioned duties, said Defendant, Charlie Belvin, failed in the performance thereof, and, without warning, negligently and recklessly caused his motor vehicle to forcefully and violently strike the Plaintiffs' vehicle in the rear.

6. That as a direct and proximate result of the negligent acts of said Defendant, the Plaintiff, Pamela Ann Clark, sustained severe personal injuries to her neck, low back, head, and shock to her central nervous system.

7. That as a direct and proximate result of the negligent acts of said Defendant, the Plaintiff, Kathleen Owens, sustained severe personal injuries to her neck, head, shoulder, back and shock to her central nervous system.

8. That as a direct and proximate result of said Defendant's negligence, the Plaintiffs, Pamela Ann Clark and Kathleen Owens, have incurred, and will continue to incur, substantial expenses for medical care and attention.

9. That as a direct and proximate result of said Defendant's negligence, the Plaintiffs, Pamela Ann Clark and Kathleen Owens, have incurred, and will continue to incur, a loss of salary and wages.

WHEREFORE, the Plaintiffs, Pamela Ann Clark and Kathleen Owens, jointly claim of the Defendant, Charlie Belvin, damages in the amount of One Hundred Thousand Dollars (\$100,000.00) plus interest and costs of suit herein.

COUNT II

(VICARIOUS LIABILITY – SANTELLI TRUCKING, INC.)

1. That the Plaintiffs, Pamela Ann Clark and Kathleen Owens, hereby incorporate and adopt by reference each and every allegation contained in Count I above and further state that at the aforementioned time and place of the accident, the vehicle being driven by the Defendant, Charlie Belvin, was owned by the Defendant, Santelli Trucking, Inc..

2. That the aforesaid Defendant, Charlie Belvin, was operating said motor vehicle as the agent, servant, employee, and/or permittee of the Defendant, Santelli Trucking, Inc.

3. That as a direct and proximate result of the negligence of the Defendant, Charlie Belvin, and the vicarious liability of the Defendant, Santelli Trucking, Inc., the Plaintiffs, Pamela Ann Clark and Kathleen Owens, sustained all the losses, damages, and injuries heretofore alleged.

WHEREFORE, the Plaintiffs, Pamela Ann Clark and Kathleen Owens, jointly claim of the Defendant, Santelli Trucking, Inc., damages in the amount of One Hundred Thousand Dollars (\$100,000.00) plus interest and costs of suit herein.

COUNT III

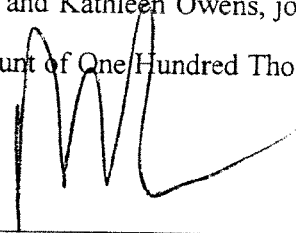
(NEGLIGENT ENTRUSTMENT – SANTELLI TRUCKING, INC.)

1. The Plaintiffs, Pamela Ann Clark and Kathleen Owens, hereby incorporate and adopt by reference each and every allegation contained in Count I and II above and further state that the Defendant, Santelli Trucking, Inc., knew or should have known that Defendant, Charlie Belvin, was likely to use the said vehicle in a manner involving unreasonable risk or serious physical harm to himself and others.

2. That the Defendant, Santelli Trucking, Inc., knew or should have known that the entrusting of a motor vehicle in view of the Defendant's, Charlie Belvin, immaturity, driving record, and inexperience was likely to involve unreasonable risk or serious physical harm to himself and others.

3. That as a direct and proximate result of the combined negligence of Defendant, Charlie Belvin and the negligent entrustment of Defendant, Santelli Trucking, Inc., the Plaintiffs sustained, and will continue to sustain, the losses and injuries hereinabove stated.

WHEREFORE, the Plaintiffs, Pamela Ann Clark and Kathleen Owens, jointly claim of the Defendant, Santelli Trucking, Inc., damages in the amount of One Hundred Thousand Dollars (\$100,000.00), plus interest and costs of suit herein.



Marvin Liss
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(202) 237-6300
Attorney for Plaintiffs

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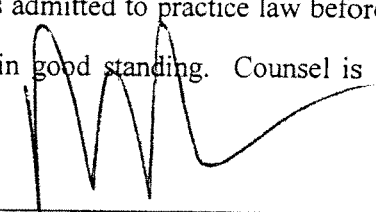
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Defendants:

CERTIFICATION

Mr. Clerk:

Undersigned Counsel hereby certifies that he is admitted to practice law before the Court of Appeals for the State of Maryland and that he is in good standing. Counsel is licensed to practice law in the State of Maryland.



Marvin Liss

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Attorney for Plaintiffs